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Sky Law Group

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SKY LAW GROUP, a California Professional  
Corporation,

Plaintiff,

vs.

PAUL PADDA LAW, PLLC, a Nevada  
Professional Limited Liability Company; and  
DARSHPAUL S. PADDA, ESQ., an individual,

Defendants.

AND RELATED CLAIMS.

Case No. 2:23-cv-01793-CDS-MDC

**STIPULATION AND ORDER PERMITTING  
PLAINTIFF TO DEPOSE DEFENDANTS  
OUTSIDE THE CLOSE OF DISCOVERY**

**(FIRST REQUEST)**

Plaintiff Sky Law Group (“Sky Law”) and Defendants Paul Padda Law, PLLC (“Padda Law”) and Darshpaul S. Padda, Esq. (“Mr. Padda” and together, the “Padda Defendants”), by and through their respective counsel, stipulate and agree as follows:

1. Pursuant to the October 8, 2024 Order [ECF No. 70] granting the parties’ October 2, 2024 Stipulation [ECF No. 65], discovery closes in this matter on December 20, 2024, with a February 18, 2025 deadline for filing dispositive motions;

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2. On November 26, 2024, Sky Law's counsel requested availability for the individual deposition of Mr. Padda, the Fed. R. Civ. P. 30(b)(6) deposition of Padda Law, and the individual deposition of the Padda Defendants' expert (Rob Bare, Esq.) for dates prior to the discovery cut-off;

3. On December 3, 2024, the Padda Defendants noticed the individual depositions of Sky Law's principals (Kiran Bisla, Esq. and Shakeal Masoud, Esq.) and the individual deposition of Sky Law's expert (Alan Freer, Esq.) for dates prior to the discovery cut-off;

4. Also on December 3, 2024, Sky Law noticed the individual deposition of Mr. Padda, the Fed. R. Civ. P. 30(b)(6) deposition of Padda Law, and the individual deposition of Mr. Bare for dates prior to the discovery cut-off;

5. On December 5, 2024, respective counsel for Sky Law and the Padda Defendants met and conferred regarding deposition scheduling in this matter. Based on availability of the parties and their respective counsel and experts, the parties agreed to the following schedule for depositions:

- a. Mr. Bare: December 17, 2024;
- b. Mr. Freer: December 18, 2024;
- c. Mr. Masoud: December 19, 2024;
- d. Ms. Bisla (individually and in her capacity as a Fed. R. Civ. P. 30(b)(6) representative of Sky Law): December 20, 2024; and
- e. Mr. Padda (individually and in his capacity as a Fed. R. Civ. P. 30(b)(6) representative of Padda Law): January 3, 2025.

6. On December 6, 2024, the Padda Defendants noticed the Fed. R. Civ. P. 30(b)(6) deposition of Sky Law, consistent with the parties' discussions;

7. Good cause exists to permit Sky Law to depose the Padda Defendants outside the close of discovery. Despite good faith attempts to find a mutually available date, given his existing commitments, Mr. Padda was unavailable to be deposed prior to the discovery cut-off. Therefore, the parties identified a date shortly after the discovery cut-off but sufficiently in advance of the dispositive motions deadline to proceed with the Padda Defendants' depositions;

8. For these reasons, Sky Law may proceed with the Padda Defendants' depositions outside the close of discovery as if the depositions had been taken during discovery;

9. This is the first request by the parties to proceed with depositions outside the close of discovery. All other deadlines set forth by the Court in its October 8, 2024 Order [ECF No. 70] remain in effect; and

10. This Stipulation is entered into in good faith and not for purposes of delay.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 20<sup>th</sup> day of December, 2024.

DATED this 20<sup>th</sup> day of December, 2024.

BAILEY ♦ KENNEDY

SPENCER FANE

By: /s/ Joshua P. Gilmore

By: /s/ Oliver J. Pancheri

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*Attorneys for Plaintiff/Counterdefendant*  
SKY LAW GROUP

*Attorneys for Defendants and Counterclaimant*  
PAUL PADDA LAW, PLLC and  
DARSHPAUL S. PADDA, ESQ.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 12-30-24